

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,

Plaintiff,

ex rel.

JAMES DOGHARAMJI; SHEREE COOK;
and RACHEL BRYANT

Relators,

v.

COMMUNITY HEALTH SYSTEMS, INC.
et al.

Defendants.

CASE NO. 3:11-cv-0442

**JUDGE SHARP
MAGISTRATE JUDGE GRIFFIN**

JURY DEMAND

**RELATORS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO STAY
FILING OF PETITION FOR ATTORNEYS' FEES**

Relators Dr. James Doghramji, Sheree Cook, and Rachel Bryant (“Relators”) request that Defendants’ Motion to Stay Filing of Petition for Attorneys’ Fees (Doc. No. 82) be denied as moot, as Relators’ Motion for Award of Attorneys’ Fees, Costs, and Expenses (“Relators’ Fee Petition”) was filed on September 29, 2014. (Doc. No 86).

On August 4, 2014, the United States notified the Court that the parties had entered into a settlement agreement resolving this litigation. (Doc. No. 75). Pursuant to the settlement agreement, Relators retained the right to move for reasonable attorneys' fees, expenses, and costs pursuant to 31 U.S.C. § 3730(d). (Doc. No. 75, ECF PageID #615). On August 14, 2014, the Court entered an order dismissing this matter in light of the parties' settlement. (Doc. No. 77).

Pursuant to the Court's Local Rule 54.01(b), Relators' counsel were required to file any motion seeking an award of attorneys' fees, costs, and expenses on or before September 15, 2014. Relators subsequently sought, and CHS did not oppose, a two-week extension of that deadline. (Doc. No. 79). The Court granted Relators' request and extended Relators' filing deadline to Monday, September 29, 2014. (Doc. No. 80).

On September 25, 2014, more than 40 days after the entry of final judgment and just two business days before the unopposed, extended deadline for Relators to file their Fee Petition, Defendants filed their pending Motion, seeking to stay the filing of Relators' Fee Petition. (Doc. No. 82). Pursuant to Local Rule 7.01(b), Relators' response to Defendants' Motion to Stay is not due until October 9, 2014.

On September 29, 2014, pursuant to the deadline set forth in Local Rule 54, as extended at Relators' request, Relators filed their Fee Petition. (Doc. No. 86). Defendants' Response to the Fee Petition is due on October 13, 2014, and Relators will file their Reply on or before October 19, 2014. Thus, Relators' Fee Petition will be fully briefed in less than three weeks.

Relators' Fee Petition has been filed, and Defendants can timely file any objections to Relators' Fee Petition on or before their October 13 deadline to do so. Thus, Defendants' Motion to Stay Filing of Petition for Attorneys' Fees should be denied as moot.

Date: October 2, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2014, a copy of the foregoing *Relators' Response in Opposition to Defendants' Motion for Stay Filing of Petition for Attorneys' Fees* was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to the counsel of record listed below.

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